

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

NEW VIRGINIA MAJORITY EDUCATION
FUND, et al.,

Plaintiffs,

-against-

VIRGINIA DEPARTMENT OF ELECTIONS,
et al.,

Defendants.

Case No.: 3:20-cv-801

**CONSENT MOTION FOR TEMPORARY RESTRAINING ORDER
AND EMERGENCY INJUNCTION RELIEF**

Plaintiffs New Virginia Majority Education Fund, Virginia Civic Engagement Table, and League of Women Voters of Virginia, by counsel, respectfully move this Court for a temporary restraining order and emergency injunctive relief, and in support thereof, state as follows:

1. Today, October 13, 2020, is the deadline for voter registration in the Commonwealth of Virginia for the November 3, 2020 election.
2. For the reasons stated in Plaintiffs' Brief in Support of the Motion, Plaintiffs request an temporary restraining order that:
 - a. Orders Defendants to extend Virginia's voter registration deadline up to and including 11:59 p.m. on October 15, 2020;
 - b. Enjoins Defendants from closing online voter registration, or refusing to accept otherwise proper voter registration forms, in Virginia prior to 11:59 p.m. on October 15, 2020;

- c. Orders Defendants to provide public notice of the extended voter registration window by notifying all local media of the extension and by posting sufficient notice of the extension on the state election website, and by instructing local election officials to do the same.
3. Plaintiffs incorporate by reference the Brief in Support of this Motion, which is being filed today.
4. Defendants have consented to the relief requested, and a proposed consent order approved by the Attorney General's Office and the Defendants, is filed herewith.

Dated: October 13, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on October 13, 2020, I caused a copy of Plaintiffs' Motion for Temporary Restraining Order and Emergency Injunctive Relief to be served on the following via electronic mail:

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Dated: October 13, 2020

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